



CERTIFIED MAIL - RETURN RECEIPT REQUESTED P 254 179 529

May 4, 1999

Mr. Duane Heaton Remedial Project Manager CERCLA Enforcement Section U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Subject:

BASF Corporation Riverview Site Inspection Report and

Proposed Site Modification Program

Riverview, Michigan

Dear Mr. Heaton:

Please find enclosed the Spring 1999 inspection report for the BASF Corporation Riverview Site. Submittal of this report is required by Consent Decree No. 80-73699 of July 1984. Please notify BASF if there is another person at EPA who should receive this report and information.

The Michigan Department of Environmental Quality (DEQ) contacted BASF and requested a Work Plan to conduct an environmental assessment of the Riverview property and to evaluate potential impact from groundwater to the Detroit River. BASF provided the Work Plan to the DEQ on April 20, 1999. In addition to the Work Plan, BASF was directed to mitigate or prevent contaminated surface water runoff from entering the Detroit River. Our plans to accomplish this goal are being developed, and portions of which run counter to certain of the requirements for site modification as specified in the Consent Decree. This letter informs the EPA of our plans and the reasoning behind them.

Under the terms of the Consent Decree, BASF was to maintain a concrete ditch through the center of the property that directs surface water runoff to the River. Currently, the level of the ditch is below the water table, and due to cracks and breaks in the ditch, groundwater is moving directly into the ditch and flowing to the River. BASF is preparing a construction plan to remove the concrete ditch, lay a geo-textile fabric on the ground, cover the fabric with clay, and re-grade the area. Completion of this work will prevent groundwater from seeping to the ground surface, mixing with runoff, and flowing into the River.



The Riverview property is essentially a 30-acre lawn. Although the Consent Decree only permits deep-rooted vegetation in uncapped areas, BASF believes the absence of trees, shrubs, and other similar vegetation contributes to the high water table present on the property. We therefore believe the use of fast-growing, water-scavenging trees will consume large volumes of groundwater and mitigate potential adverse effects on the River. BASF plans to plant a multitude of hybrid poplar trees (possibly several thousand) on uncapped portions of the property. The planting could occur as early as the next few weeks, and it will be concentrated around the western perimeter of the site. As the environmental assessment proceeds, additional planting may occur as we complete the assessment in particular areas. For example, BASF plans to install additional monitoring wells between the caps and the River. Once this work is complete, trees could be planted in that area as well.

Please feel free to call me at 734-324-6209, or Mr. Jack Lanigan at (734) 324-6219, with questions.

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Thomas F. McGourty

Manager, Quality and Ecology Services

Enclosure

cc:

Beth Vens, MDEQ Keith Mast, URSGWC John Gerlach, BAUF Jack Lanigan

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AGEN	CY REPORT 1	S DUE WITHIN	TWO WEEKS	AFTER INSPECTION					
UPON	REVIEW AND	APPROVAL, RE	TURN THIS	PM TO ECOLOGY FOR	PREPARATION OF PRI	NTED REPORT AND	FILING BY SITE EN	GINEERING.	
This	PM require	s the inspec	tor to loc	k at many things	and walk or drive o	ver a large area	a. The inspector sh	ould read this	PM
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		plant life which might or does have tap roots). Any			·
		vegetation which is taller than surrounding vegetation			
		should be considered deep-rooted.	11-1	and Herry	
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Joint 29:		Joint 30:	
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protruding above the surface of the concrete? Is the	
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joint, is it clear or off color?	
Joint B:	Joint C:
Observation: JOIP TALL	Observation: Voict Fire
Response:	Response:
	Joint D:
	Observation:
	Response:
VII. Inspect each of the nine (9) monitoring wells for	VII. List any problems with the
integrity.	wells.
	Observation: All walls .~
	Soud condition of lockel.
	Response:
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Upon completion of this PM, it must be routed for signature/comments as	s indicated on page 1.
Inspected by:	Date Inspected: 27 April 1999
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PM Reviewed and Response initiated by:	